

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:  
All Actions

**DECLARATION OF MONICA L.  
DAVIES IN SUPPORT OF  
MOTION FOR PROTECTIVE  
ORDER CONCERNING  
PLAINTIFFS' SUBPOENA TO  
W.J. MINKOWYCZ, Ph.D.**

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Monica L. Davies, being first duly sworn, deposes and declares:

1. I am one of the attorneys representing Defendants in connection with the above-referenced matter. I make this declaration in support of Defendants' Motion for Protective Order Concerning Plaintiffs' Subpoena to W.J. Minkowycz, Ph.D.
2. Attached hereto as Exhibit 1 is a true and correct copy of the subpoena served by Plaintiffs on Dr. Minkowycz.
3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the February 10, 2018 deposition of Dr. Said Elghobashi in connection with the *Gareis* matter (File No. 16-v-4187).

Executed in Minneapolis, Minnesota, this 26th day of February, 2018.

s/ Monica L. Davies  
Monica L. Davies